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**From:** Hayden, Melva [Hayden.Melva@epa.gov]  
**Sent:** 4/26/2017 9:17:26 PM  
**To:** Oropallo, Michael A. [moropallo@barclaydamon.com]  
**CC:** Paul, Thomas J. [tpaul@barclaydamon.com]; Guster, Edward [Guster.Edward@epa.gov]; Thomas, Derval [Thomas.Derval@epa.gov]; Voo, Leonard [Voo.Leonard@epa.gov]; Sawyer, William [Sawyer.William@epa.gov]  
**Subject:** I/M/O Lansing Rod and Gun Club, Docket No. RCRA-02-2017-7301 Environmental Stewardship Plan & Outreach  
**Flag:** Follow up

Dear Mr. Oropallo, et al

I hope all is well. Now that both Edward Guster and I have reviewed the Environmental Stewardship Plan ("ESP" or the "Plan") you submitted on behalf of your clients, the Lansing Gun and Rod Club ("Respondent," or the "Club"), on or about December 28, 2016, as required under the October 6, 2016 Administrative Order on Consent ("AOC" or the "Order") that the parties entered into, this email communication is transmitted for the purpose of scheduling a conference call with you to discuss one outstanding concern EPA has with regard to the ESP before the Club begins to implement the Plan. Please be advised that EPA believes the Plan is well-written and addresses all Best Management Practices (BMPs) in EPA's Manual. The Plan discusses how the Club will endeavor to recycle lead shot and will reach out to the Universities in the area for expertise on soil and water.

To avoid blind-siding you and as a professional courtesy, I am communicating with you in advance of the Club starting the work to relocate the trap ranges pursuant to Option B in the Plan.

You may recall that during the public availability sessions, commenters raised the question with EPA as to whether the Club will provide them with a copy of the ESP before the Plan is implemented and asked that the Club reach out to commenters to allow for public input into the ESP. As you may further recall, EPA did indicate in its Responsiveness Summary ("RS") that it did not plan to amend the Order based on any of the comments it received during the public comment period and during the public availability sessions. However, EPA did indicate in the RS that it will work with the Club and discuss opportunities for outreach to the public during critical stages of its implementation of the ESP.

See the specific question and response from the Responsiveness Summary regarding this concern (attached hereto)

**Comments that the Public Stakeholders be added to the Order and ESP**

*There is a concern that lack of public input into the Order and preparation of the ESP will set up the Club to fail because the Club lacks the knowledge and understanding of how to implement an ESP and conduct testing of soils and pH, etc. One commenter asked that the Order include a provision that stakeholders be included in the preparation and implementation of the ESP. One citizen asked that an Environmental Task force be created to help the club.*

**EPA's Response:**

*EPA does not have the authority to force the Club to work with any outside entities. RCRA 7003 Orders are issued by EPA to parties who have contributed to a problem. EPA will encourage the Club to consult with local authorities as it draws up its plans. While EPA will not be formally amending the Order to add additional parties to the review processes in the Order, EPA plans to provide opportunities for input and comments from local citizens and authorities at key junctures in the implementation of the work under the Order. EPA will discuss these issues with the Club and recommend that it keep the community informed of its plans (including the Environmental Stewardship Plan) and solicit input from the community.*

EPA believes it would be beneficial for the Club to provide a copy of the ESP to the commenters and give them an opportunity to have input on the ESP prior to its implementation and would like to discuss this concern in further detail. After the holidays, I will provide you with possible dates and times that EPA representatives will be available to schedule said conference call. However, if you wish to discuss any of the above before that time, you may contact me at my EPA office number (212) 637-3230, or via email at [hayden.melva@epa.gov](mailto:hayden.melva@epa.gov).

Sincerely,

Melva J. Hayden

Melva J. Hayden, Esq.  
Assistant Regional Counsel  
Region 2 Title VI Coordinator  
Office of Regional Counsel  
U.S. EPA - Region 2  
290 Broadway - 16th Floor  
New York, NY 10007-1866  
212-637-3230 (EPA Office)  
212-637-3202 (EPA Fax)  
718-712-5674 (Alternate Work Location Number)